UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 1 1 2017

CERTIFIED MAIL 7016 0600 0000 3846 8241
RETURNED RECEIPT REQUESTED

Mr. Frank Fletcher
VP of Manufacturing
Cardinal Aluminum Fishing, LLC
4005 Oaklawn Drive
Louisville, Kentucky 40219

Re: Compliance Stormwater Evaluation Inspection
Cardinal Aluminum Fishing, LLC
Permit No. KYR003672

Dear Mr. Kintner:

On May 10, 2017, the U.S. Environmental Protection Agency Region 4, the Kentucky Department for Environmental Protection, and the Louisville and Jefferson County Metropolitan Sewer District conducted a Compliance Stormwater Evaluation Inspection (CSWEI) at the Cardinal Aluminum Fishing, LLC (Facility) located at 4005 Oaklawn Drive, Louisville, Jefferson County, Kentucky. The purpose of the CSWEI was to evaluate the Facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and the Commonwealth of Kentucky's *Authorization to Discharge Under the Kentucky Pollutant Discharge Elimination System General Permit, KYR003672*.

Enclosed is the EPA's CSWEI report, dated July 6, 2017. While a response from you is not required at this time, if you do wish to respond to the CSWEI report, provide additional information, or otherwise discuss the report, please contact Mr. Kenneth Kwan, P.E., at the above address, at Kwan.Ken@epa.gov, or at (404) 562-9752.

Sincerely,

Daniel J. O'Lone, Chief
Stormwater and Residuals Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosure

cc: See Attached Mailing List

Mailing List:

KY Division of Water
Attn. Peter Goodmann, Director
300 Sower Blvd, 3rd Floor
Frankfort, KY 40601

KY Division of Water
Attn. Charlie Roth, Supervisor
9116 Leesgate Rd.
Louisville, KY 40222

Mike Moore
Industrial Programs Manager
Louisville MSD
3050 Commerce Center Place
Louisville, KY 40211

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303

Water Compliance Inspection Report

FACILITY DATA

NPDES ID: KYR003672	Effective Date: 06/01/13	Expiration Date: 05/31/18
Facility Name: Cardinal Aluminum Finishing, LLC		SIC Code: 3312
Address: 4005 Oaklawn Drive, Louisville, KY 40219		

On-Site Representative(s), Title, Phone Number:	Responsible Official, Title, Phone Number, Mailing Address:
Frank Fletcher, VP of Manufacturing. 502-969-9302 x 306	Frank Fletcher, VP of Manufacturing. 6910 Preston Highway, Louisville KY 40219

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 5/10/17, 2:15 p.m.	Exit Date/Time: 5/10/17, 5:45 pm

NAMES OF EPA AND STATE INSPECTORS

EPA Inspectors: Mark Robertson, Becky Garnett, Kenneth Kwan
KDEP Inspectors: Brad Trivette, Charlie Roth
Local Authority Inspectors: MSD: Michael Moore, Jordan Basham

AREAS EVALUATED DURING INSPECTION *(Check those areas evaluated)*

X	Permit	X	Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule		Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent / Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION NOTES

This facility has permit coverage for one outfall under KPDES No. KYR003679. On February 1, 2015, the permit was modified to add outfall 002 under a new KPDES No. KYR003672.

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
Kenneth Kwan / Mark Robertson Environmental Engineers	USEPA Region 4/WPD-NPEB-SRES 404-562-9752 / 404-562-9639	7/6/17
Becky Garnett, Environmental Scientist	USEPA Region 4/WPD-NPEB-SRES 404-562-8083	7/6/17
Management Signature/Name	**Office/Phone Number**	**Date**
Daniel J. O'Lone, Chief Stormwater and Residuals Enforcement Section	USEPA Region 4/WPD-NPEB-SRES 404-562-9434	7/10/17

1. FACILITY LOCATION INFORMATION

GPS Coordinates	**Latitude**	38.148784		**Longitude**	-85.6841019		
Receiving Water(s) or MS4	Northern Ditch, MSD maintained canal.	**Site Acreage**	6.4 acres 90% impervious	**Weather Condition**	Sunny		
Date of NOI (or permit coverage acknowledgement letter	Coverage letter effective 11/1/13	**SIC Code(s)**	3354	**Discharge to 303(d) listed or TMDL waters**	No	**Does the site discharge pollutants contributing to the receiving stream impairment?**	N/A

2. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORMATION & OTHER NON-NUMERIC REQUIREMENTS

SWPPP REQUIREMENTS (PERMIT SECTION 3) & OTHER NON-NUMERIC REQUIREMENTS (PERMIT SECTION 2)	YES	NO	N/E
2(A): Stormwater pollution prevention team **Section 3.1** *The title, roles, and responsibilities of each team members regarding the implementation of the SWPPP was not identified and discussed in the SWPPP.*		X	
2(B): Site description **Section 3.2** (Detailed description of activities undertaken at the facility, and site map containing 14 required permit information)	X		
2(C): Summary of potential pollutant sources, and pollutants associated with each source **Section 3.3** (Include material handling, industrial machinery, raw materials, industrial production & processes, intermediate product, by-product, final products, waste products, loading & unloading, transportation, disposal, and conveyance of any material or product)	X		
2(D): Description of where potential spills and leaks could occur, and the corresponding outfalls that would be affected. **Section 3.3.3** *No spills reported during past three years.*	X		
2(E): **Evaluation of the facility for the presence of non-stormwater discharges** **Section 3.3.4** *Non-stormwater discharge evaluation was conducted on 10/13/14.*	X		
2(F): Summarization of all stormwater discharge sampling data collected during the previous permit term Section 3.3.6		X	
2(G): Description of control measures **Section 3.4**	X		
2(H): Schedules and procedures **Section 3.5** 1. Schedule & procedure for regular pickup and disposal of waste materials, along with routine inspections for leaks of drums, tanks, and containers 2. Preventative maintenance procedure, including regular inspections, testing, maintenance, and repair of all industrial equipment and system & control measured 3. Procedures for preventing and responding to spills and leaks 4. Schedule for all necessary employee training	X		
2(I): Additional SWPPP document requirements **Section 3.6** (NOI, coverage letter, permit, daily precipitation log, incident reports, employee training records, control measures maintenance & repairs logs, inspection reports, and corrective reports)	X		
2(J): SWPPP signature requirements **Sections 3.7 & 6.11** *Dated 10/15/14*	X		

2(K): SWPPP modification **Section 3.8** *Appendix G of the SWPPP specified annual BMP and SWPPP review.*	X		
2(L): SWPPP on-site **Section 3.9**	X		
2(M): Inspections **Section 3.10** (Quarterly inspections of BMPs, annual site assessment, and inspections in response to 2-year, 24-hour storm event) *Facility stated that they were not aware of the requirement to conduct inspections triggered by a 2 year, 24-hour storm event.*		X	
2(N): Corrective actions taken as result of: **Section 3.11** - Unauthorized discharge or release of pollutant - Deficiencies ID during inspections - Changed in facility operations	X		
2(O): Control Measures design, install, and implement with good engineering practices **Section 2.1**	X		
2(P): Minimize the exposure of manufacturing, processing, and material storage areas **Section 2.2** (see list of 14 BMPs to consider in the permit)	X		
2(Q): Good Housekeeping at all exposed areas, minimize the generation of dust, and off-site tracking of materials **Section 2.3**	X		
2(R): Regularly inspect, test, maintain, and repair of equipment and system to minimize leaks & spills. Repaired or replaced defective control measures as expeditiously as practicable. **Section 2.4**	X		
2(S): Develop spill prevention and response procedures for effective response to spills & leaks **Section 2.5**	X		
2(T): Management of runoff and run-on minimize the discharge of pollutants **Section 2.6** (velocity dissipaters, diversion, infiltration, reuse, and containment)	X		
2(U): Employee Training **Section 2.7**	X		

3. SITE DESCRIPTION and SWPPP

Cardinal Aluminum Finishing, LLC began operation in 1946. It has 370 employees and operates two shifts from Monday to Saturday. Facility has two presses that extrude aluminum. It utilizes 17 multi-axis CNC machines to perform fabrication of aluminum involving deburring, drilling and forming. The finishing process for customers include anodizing, powder coating, sanding, chemical etching, polishing, buffing and tumbling. All industrial process operations are conducted indoors, under roof. Pollution sources consist of parking area, truck loading area, scrap metal dumpsters and used oil totes. Site sloped from east to west and drains by sheet flow to several stormwater drain inlets. The facility also has a pretreatment permit to discharge process wastewater to a municipal wastewater treatment plant.

4. RECORD REVIEW

Record Review	YES	NO	N/E
4(A): Representative on-site	X		
4(B): Copy of NOI-KYR00 submitted to KDOW & coverage letter **Section 3.6**	X		
4(C): Daily Precipitation Log **Section 3.6**	X		
4(D): Incident Reports **Sections 3.6**			X

No spills have occurred during the past three years.			
4(E): Records of Employee Annual Training **Section 3.6** *Last employee training was conducted on 11/5/14. No employee training records for years 2015 and 2016.*		X	
4(F): Records of Housekeeping Programs **Section 2.3**	X		
4(G): Records of Control Measure Maintenance & Repairs Logs **Section 3.6**			X
4(H): Records of Quarterly Inspections of BMPs document the following information: **Section 3.10** *Inspections were conducted more often than required up to frequency of weekly. However, the records of the inspection only listed the inspector and one line of information about any corrective actions needed to restore the areas to a clean state. The facility's inspector did not cover the entire area of potential source of pollutants. Also, the inspector was not using the inspection form developed by the consultant in Appendix E of the SWPPP.*		X	
4(I): Records of Annual Site Assessment **Section 3.10** *Although the consultant had designed a form in Appendix G of the SWPPP for annual site assessments, the facility personnel was not using that form, and had no discrete annual assessments available for the inspectors to review.*		X	
4(J): Records of Inspections in Response to 2-year, 24-hour Storm Event to Verify the Stability of the Control Measures & BMPs **Section 3.10** *The facility was not aware of this inspection requirement. However, rainfall data indicated that this design storm had not occurred during 2016 or 2017.*		X	
4(K): Corrective Reports **Section 3.6** *Descriptions of corrective actions should be discussed and documented in more detail.*	X		
4(L): Records of Effluent Monitoring **Sections 1.1, 4.9, & 6.12.4**	X		

5. SITE EVALUATION & SWPPP IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site
5(A): Loading/Unloading Area	*No issues noted.*
5(B): Outdoor Storage Facilities	*No issues noted.*
5(C): Storm drains	*A trickle of water was observed in the storm drain # 1 (see photo No. DSCN1173).*
5(D): Housekeeping	*A potential source of pollutants was observed at an exterior wall outside the anodizing production line. A previous leak had been fixed in the area. However, EPA inspectors observed a sloughing of solid material off of a wall of the building at that location, depositing onto the ground and potentially contaminating stormwater runoff (see photos No. DSCN1171 and DSCN1172).*

5(E): Liquid Storage Tanks	*Five 300 gallon totes were observed mostly full of used oil (see photo No. DSCN1177), and one additional red container of fresh hydraulic oil was also at the same location (see photo No. DSCN1178). No secondary containment was observed to control oil spillage. According to Spill Prevention Control, and Countermeasure (SPCC) Regulation under 40 CFR part 112, a facility is required to be covered by the SPCC rule if it has an aggregate aboveground oil storage capacity greater than 1,320 U.S. gallons. This facility has at least 1,500 gallon of oil storage capacity. Therefore, it must develop and implement an SPCC plan to address oil spill prevention, and spill cleanup procedures.*
5(F): Sediment & Erosion Controls (BMPs)	*No issues noted.*
5(G): Spills/Leaks Handing	*At the trash compactor near the southeast corner of the building, a white cloudy liquid was observed leaking onto the ground (see photo No. DSCN1165).*
5(H): Disposal Areas	*No issues noted.*
5(I): Industrial Processing Areas	*No issues noted.*

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Outfall, Stormwater Discharge & Receiving Water	**YES**	**NO**	
6(A): Number & location of stormwater discharge(s)/outfall(s) consistent with the SWPPP	X		*Two outfalls as specified on the SWPPP.*
6(B): Evidence of off-site accumulation of pollutants observed in receiving water		X	*None observed.*
6(C): Other potential discharges off-site (through outfalls not included in the SWPPP)		X	*None observed.*
6(D): Non-stormwater discharge observed	X		*Outfall 001 (see photo No. DSCN1182) and 002 (see photo No. DSCN1179) both had a trickle of flow in dry weather conditions. Sources of these dry weather discharge are unknown.*

Additional inspection summary, narrative, findings, comments, photos, and schematic diagram of the facility area as necessary:

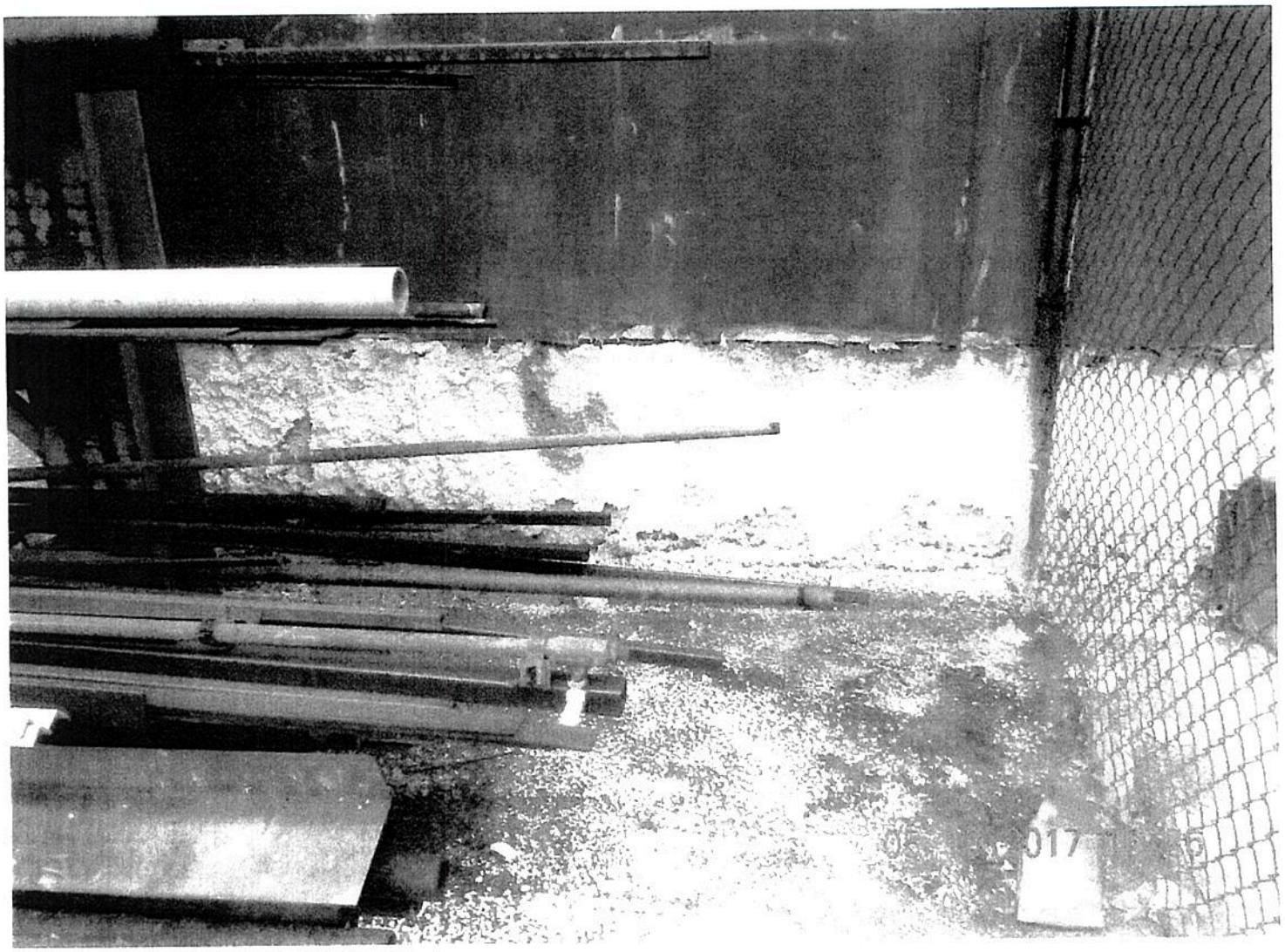
Exit conference and preliminary inspection findings conducted with: Frank Fletcher.

1. *The title, roles, and responsibilities of each team member regarding the implementation of the SWPPP were not identified and discussed.*
2. *No summarization of stormwater discharge sampling data collected during the previous permit term.*
3. *No 2 year, 24-hour storm event inspection records.*
4. *No employee training records for years 2015 and 2016.*
5. *The facility's inspector did not cover the entire area of potential source of pollutants. Also, the inspector was not using the inspection form developed by the consultant in Appendix E of the SWPP.*
6. *No annual site assessments available for the inspectors to review.*
7. *A trickle of water was observed flowing in the storm drain # 1, Outfall 001, and Outfall 002. The source of these dry weather discharge in stormwater system was not determined.*
8. *A potential source of pollutants was observed at an exterior wall outside the anodizing production line. A previous leak had been fixed, but inspectors observed a sloughing of solid material off of a wall of the building at that location, depositing onto the ground and potentially contaminating stormwater runoff*
9. *Five 300 gallon totes were observed mostly full of used oil, and one additional red container of fresh hydraulic oil was also at the same location. The facility may need to meet Spill Prevention Control, and Countermeasure (SPCC) Regulations.*
10. *At the trash compactor near the southeast corner of the building, a white cloudy liquid was observed leaking onto the ground.*

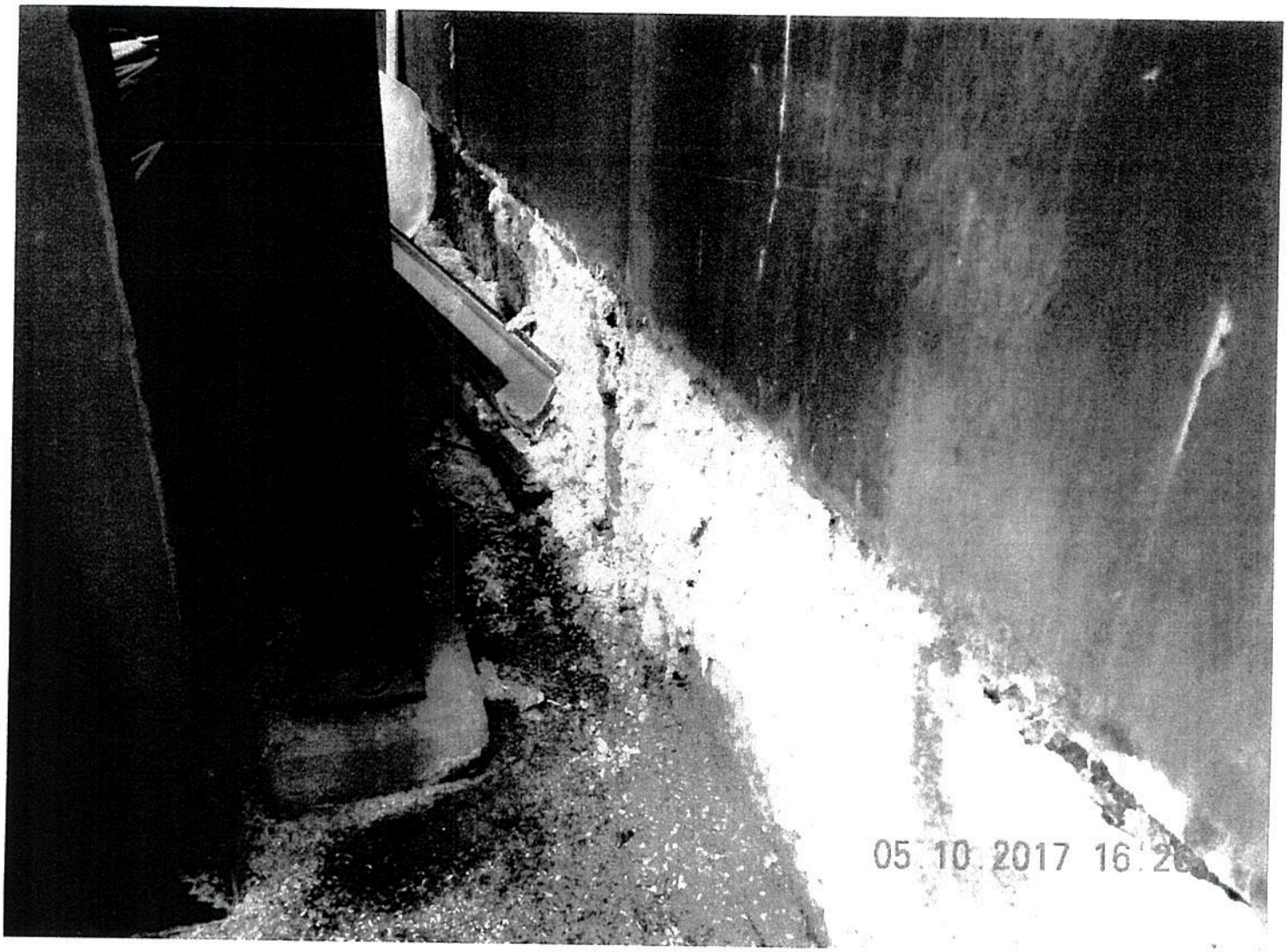
Photolog included.

Photo No. DSCN1173: *A trickle of water was observed flowing in the storm drain # 1.*

Photos No. DSCN1171: *A potential source of pollutants was observed at an exterior wall outside the anodizing production line. A previous leak had been fixed in this area. However, EPA inspectors observed a sloughing of solid material off a wall of the building, depositing onto the ground, and potentially contaminating stormwater runoff.*



Photos No. DSCN1172: *Side view of the potential source of pollutants observed at an exterior wall outside the anodizing production line.*



Photos No. DSCN1177: *Five 300 gallon totes were observed mostly full of used oil. No secondary containment was observed to control oil spillage.*

Photos No. DSCN1178: *Drums and red container of fresh hydraulic oil with no secondary containment to control oil spillage.*

Photos No. DSCN1165: *At the trash compactor near the southeast corner of the building, a white cloudy liquid was observed leaking onto the ground.*

Photos No. DSCN1172: *Outfall 002 had a trickle of flow in dry weather conditions. Sources of these dry weather discharge are unknown.*

Photos No. DSCN1182: *Outfall 001 had a trickle of flow in dry weather conditions. Sources of this dry weather discharges was unknown.*